REMARKS

Claims 1-23 are pending in this application. Claims 1-16 were rejected under 35 U.S.C. 102(b) as being allegedly anticipated by pages 16 and 17 of "The Java Platform: A White Paper" ("Kramer"). Claims 17-20 were rejected under 35 U.S.C. 103(a) as being allegedly obvious over Kramer in view of U.S. Patent No. 6,134,616 ("Beatty"). These rejections are respectfully traversed, for reasons including those set forth below. New claim 23 has been added.

Applicants' attorney believes that claims 21 and 22 are pending, but that these claims have not yet been examined. Therefore, Applicants' attorney hereby requests that the finality of the present Office Action be withdrawn pursuant to MPEP § 706.07(c) and 706.07(d) and that claims 21 and 22 be examined.

Claims 1-16, 21 and 22

Claim 1 recites:

> A software object included in a computer system, comprising:
>
> a platform dependent method; and
>
> a platform independent wrapper arranged to call the platform dependent method, wherein a platform independent object accesses the platform dependent method by calling the wrapper, wherein the wrapper then calls the platform dependent method.

The Office Action asserted the following regarding claim 1:

> As to claim 1, Kramer teaches a software object (Fig. 2, page 17, *the platform dependent part)* comprising a platform dependent method (Fig. 2, page 17, platform-dependent part), a platform independent wrapper (the combination of adapter with porting interface, fig. 2 page 17) arranged to call the platform dependent method, wherein a platform independent object (Java base platform independent) accesses the platform dependent method by calling the wrapper. Kramer's wrapper is independent because it has independent interface.

(Id. at p. 2, ¶ 2 (emphasis added).)

The Office Action further stated that "[t]he adapter of Smith is not equivalent. It anticipates the recited wrapper. It is the same thing." (Id. at p. 7, ¶ 4.) The Office

Action also asserts that "[b]oth the adapter and wrapper implementation are platform dependent." (Id. at p. 8, lines 1 and 2.)

These assertions are respectfully traversed. First of all, the claimed software object is not platform dependent. Moreover, Kramer (as understood) does not teach a platform independent wrapper within the meaning of claim 1. Instead, Kramer discloses a platform dependent adapter, which is not equivalent to the claimed wrapper. Applicants note that, in Kramer figure 2, the Java Base platform (shown in black) and the Applets and Applications (shown stacked above the Base platform) are platform independent. The Adapters are different on each platform and therefore must be platform dependent. Additionally, note the description immediately after figure 2 of Kramer, on page 17: "The porting interface has a ***platform independent part*** (shown in black), and a ***platform-dependent part,*** shown as ***Adapters***" (emphasis added.) Thus, Kramer's adapter is clearly platform dependent and cannot be said to be in any way equivalent to the platform independent wrapper of claim 1. Applicants respectfully assert that there is no support to Examiner's contention that the Kramer's "adapters" are equivalent to the wrapper of claim 1 in light of the foregoing language.

For at least the foregoing reasons, the rejection of claim 1 has been overcome. Claims 2-9 are either directly or indirectly dependent on independent claim 1 and are allowable for at least the same reasons as claim 1.

The Examiner has rejected independent claim 10 for the same reasons as claim 1. Applicants submit that claim 10 is allowable for at least the same reasons as claim 1. Claims 11-17 are either directly or indirectly dependent on independent claim 10 and are allowable for at least the same reasons as claim 10.

Claims 17-20

Claims 17-20 were rejected under 35 U.S.C. 103(a) as being allegedly obvious over Kramer in view of Beatty. These rejections are respectfully traversed. The Office Action uses the language used to reject claim 1 in the rejection of independent claim 17. Applicants believe that claim 17 is allowable for at least the same reasons given for claim 1.

However, claim 17 also recites, in pertinent part, "a business card associated with the platform independent object, the business card containing configuration data that includes an encapsulation object pointer that is used to identify the encapsulation object containing the platform dependent method . . . ."

The Office Action admits that "Kramer does not teach a business card associated with a platform independent object, configuration data, encapsulation object pointer, system manager." (Office Action at p. 5, ¶ 5.) However, the Office Action asserts:

> Beatty teaches a business card (HNS entry, col. 5, lines 35-60) associated with the platform independent object, the business card containing configuration data (col. 4, lines 44-67 to col. 5, lines 1-67) that includes an encapsulation object pointer that is used to identify the encapsulation object, retrieving the business card corresponding to the requesting object (col. 4, lines 44-67 to col. 5, lines 1-67) by the system manager (bus manager), instantiating the encapsulation object identified by the encapsulation object pointer (col. 4, lines 44-67 to col. 5, lines 1-67).

(Id. at p. 5, ¶ 6 to p. 6, ¶ 1.)

These assertions are respectfully traversed. Beatty, as indicated by the title, pertains to "Dynamic Re-Enumeration and Reconfiguration of Computer Devices After Device Hibernation." Beatty describes the "HNS" as follows:

> In a preferred embodiment of the present invention, the system view of hardware is placed in a name space tree or data structure called the Hardware Name Space (HNS) 111 in the system memory. This hierarchical tree is utilized to represent all physical system components and correlates each component to the bus on which the adapters and devices reside.

(Beatty at col. 4, lines 29-36.)

As understood, Beatty does not teach a business card within the meaning of claim 17. The HNS described in Beatty pertains to hardware, not to an encapsulation object within the meaning of claim 17. Therefore, the Office Action has shown no motivation to combine the teachings of Kramer and Beatty. Moreover, even if the teachings of Kramer and Beatty were combined, the resulting combination would not include all the elements of claim 17.

It is respectfully submitted that the foregoing arguments overcome the rejection of claim 17. Claims 18-20 are directly or indirectly dependent on claim 17 and are allowable for at least the same reasons as claim 17.

Claims 21 and 22

Applicants' attorney believes that claims 21 and 22 are pending, but that these claims have not yet been examined. Therefore, Applicants' attorney hereby requests that the finality of the present Office Action be withdrawn and that claims 21 and 22 be examined. It is respectfully submitted that claims 21 and 22 are allowable for at least the reasons set forth above.

New Claim 23

Claim 23 recites:

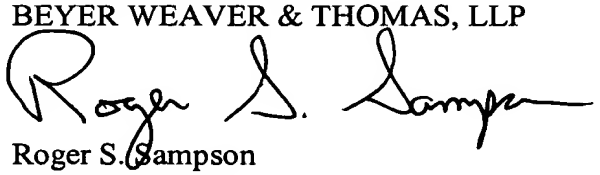
> A native encapsulation object included in a computer system, the native encapsulation object comprising:
>
> a plurality of device drivers; and
>
> a plurality of wrappers arranged to call an associated device driver of the plurality of device drivers, wherein a platform independent object accesses an associated device driver by calling one of the plurality of wrappers, wherein the wrapper then calls the associated device driver.

Support for claim 23 may be found, for example, at page 5, line 10, through page 6, line 4 of the present application. For at least the foregoing reasons, it is respectfully submitted that claim 23 is allowable over the art relied upon in the Office Action.

CONCLUSION

In view of the foregoing, it is respectfully submitted that all pending claims are allowable. Should the Examiner believe that a further telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set forth below.

Respectfully submitted,
BEYER WEAVER & THOMAS, LLP



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